



The DEC's assurance approach

The DEC's work is driven by a commitment to best practice, compliance with legal and regulatory requirements, and being accountable both to donors in the UK and to the crises-affected people for whom we raise funds.

The DEC model relies on an assurance framework where DEC sets out standards of good practice aligned with regulatory and self-regulatory requirements, and member charities provide evidence of meeting such standards.

The DEC sets highest standards of quality and accountability, and members are responsible to meet such standards and provide evidence to the DEC on how the standards are met. Three inter-related processes offer assurance: the three-yearly **membership review**, the **DEC Accountability Framework** and the **due diligence self-assessment standards**.

Membership criteria include key requirements under finance, communication and fundraising, as well programme delivery. Following revision in June 2017, the criteria now make specific reference to a requirement of members:

- To comply with legal and regulatory requirements, including the Charity Commission and Companies House
- To ensure that no activities are undertaken which could have a serious adverse impact on the DEC and other members
- To make a public commitment to the Core Humanitarian Standard¹ (CHS) and to provide external assurance of measurable progress in implementation through the CHS Verification Scheme²
- To have a demonstrable commitment to protection of crisis-affected populations, including protection from sexual exploitation and abuse. This is already covered under the CHS, though it is spelled out separately in the membership criteria.

The **membership review** looks at evidence provided by members on how they meet the DEC criteria. Members confirmed that they meet the criteria as part of the review in 2017, and:

- Confirmed that they have not experienced any serious incidents involving DEC funds or in DEC appeal countries over the last three years that have not been reported to the DEC or relevant authorities, including the Charity Commission³
- Re-affirmed commitment to safeguarding standards such as the IASC Minimum Operating Standards on Protection from Sexual Exploitation and Abuse
- Summarised their approach to ensuring that safeguarding is observed across their organisation and by those who operate on their behalf.

As part of the **Accountability Framework**, member charities are challenged to provide assurance on quality and accountability through third-party verification against The Core Humanitarian Standard on Quality and Accountability (CHS). This means that, as well as holding members to account for delivering high quality individual humanitarian programmes, the DEC asks them to examine their ways of working across all operations and to strengthen the systems which underpin their ability to consistently deliver effective response for people affected by crises. The CHS requires agencies to have in place their own safeguarding policies and procedures and to identify and act upon potential or actual unintended negative effects of their actions.

¹ Adopted by the Board in 2015 to replace the DEC Ways of Working

² As of September 2018, of the 14 DEC members, six are certified in conformity with the CHS, three verified by the Humanitarian Quality Assurance Initiative (HQAI); one more is undergoing HQAI verification and the DEC has commissioned an independent validation of self-assessment scores for four of them.

³ One member was filing a Serious Incident Report with the Charity Commission at the time of the review.

Programme-specific plans, reports and independent evaluations drill down on specific DEC-funded humanitarian operations, asking questions and seeking assurance on how well member agencies utilise tranches of DEC funding, and how they apply the Core Humanitarian Standard in DEC-funded programmes. Members report to the DEC regularly and at least every six months on projects funded from DEC appeals, with a review of risk factors and how they may impact on the response. The risk of potential harm, in particular involving vulnerable groups, is assessed by member agencies as part of the risk register that they submit to the DEC.

Through a process of project review, scrutiny, evaluation, collaboration, reporting and transparency as part of the Accountability Framework, the DEC works with members to help them ensure that programme safeguards are properly considered.

DEC's own **due diligence standards** apply to all member agencies and require assurance of their ability to work in complex and high-risk situations. They cover: financial controls, governance, accountability, working with partners, procurement and cash programming. In particular, the standards ask members to confirm that they "promptly investigate and inform the DEC, Charity Commission, the police and relevant donors as appropriate of suspected or reported serious incidents arising from community feedback." Members self-assess against the standard.

A risk-based approach to safeguarding

Given the challenging nature of the work undertaken and the difficult contexts where DEC funds are spent, it is likely that serious incidents will occur. Where this is the case, the DEC requires assurance that members manage the incident responsibly, taking steps to limit its immediate impact and where possible, prevent it from happening again. At a minimum, DEC members are expected to put safeguards in place to protect all those who come into contact with their work, including but not limited to:

- ensuring that staff, volunteers and contractors are aware of what abuse is and how to identify it
- having a clear system of reporting concerns as soon as abuse is identified or suspected
- responding immediately to abuse or allegations of abuse and carrying out confidential investigations
- preventing harm and abuse through a rigorous recruitment process
- undertaking due diligence when they operate through partners

DEC members are also required to ensure that **downstream partners** who receive DEC funds have in place similar policies and that these are well understood. At a minimum, members are expected to have a good understanding of their partners, their policies and procedures and to have performed their own due diligence over their operations. Through programme plans and reports, members are asked to provide evidence to the DEC that they have robust procedures in place for working with partners, and a methodology of assuring reporting received from partners.

The **Board's Membership and Accountability Committee** has responsibility to review the DEC membership criteria and adherence for existing members. It examines and reviews the standards set for members, the Accountability Framework, and requests assurance from members in relation to DEC appeal funds. This is in line with the Charity Commission, which states that trustees should be satisfied that any partner organisation has in place adequate safeguarding arrangements, including appropriate policies and mechanisms to provide assurance on compliance. Serious allegations or incidents involving a DEC member are immediately escalated to the Chair, and Trustees are kept informed of any actions or investigations, with issues referred to the Charity Commission where relevant.

In December 2016 the Board passed a new provision allowing for the temporary suspension of a DEC member, and temporary removal of the member trustee, in exceptional circumstances and in recognition of the increasingly complex risks faced by the DEC and its member agencies. The new provision has not been used but is a safeguard to DEC where a very serious matter involving a member agency requires time for investigation, review and/or trustee decision.

The DEC procedure on **reporting serious incidents** was updated in October 2017 and will be further revised after the Charity Commission issues new guidance later in 2018. The DEC continues regular dialogue and engagement with the Charity Commission.